



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

SMALL BUSINESS/SELF-EMPLOYED DIVISION

June 17, 2014

Control Number: SBSE-05-0614-0045
Expiration: June 17, 2015
Impacted: IRM 5.8.3, 5.8.4

MEMORANDUM FOR DIRECTORS, COMPLIANCE CAMPUS OPERATIONS
(BROOKHAVEN, MEMPHIS)
DIRECTORS, FIELD COLLECTION AREA OPERATIONS
(SOUTH ATLANTIC, GULF STATES, SOUTHWEST)

FROM: Rocco Steco /s/ *Rocco Steco*
Acting Director, Collection Policy

SUBJECT: Interim Guidance on Investigation of Offers under Appeals' Jurisdiction

This memorandum provides interim guidance (IG) for Collection employees working offer in compromise cases and revises the procedures in Internal Revenue Manual (IRM) 5.8.4.15, *Investigation of Offers under Appeals Jurisdiction*.

Background

Currently, IRM 5.8.4.15 provides guidance relative to the initial investigation of offers in compromise (OIC) submitted during a Collection Due Process (CDP) hearing for the Centralized Offer in Compromise (COIC) units located in the Brookhaven and Memphis Service Centers. The guidance in the attachment revises those procedures for COIC and expands the initial investigation of offers submitted during a CDP hearing to field OIC groups.

The revisions coincide with guidance being issued by the Office of Appeals which incorporates changes based on the Appeals' Judicial Approach and Culture (AJAC) project.

Situations in which the taxpayer submits a CDP during an offer investigation and the issuance of an Appeals' Referral Investigation are also discussed in the attached guidance.

SUMMARY

This guidance is effective for offers submitted after August 11, 2014, and will be incorporated into the IRM within one year of issuance.

You may direct any questions regarding these procedures to Diana Estey, National Offer in Compromise Program Manager, or a member of your staff may contact Senior OIC Analyst, Thomas B. Moore.

Attachment

cc: Director, Enterprise Collection Strategy
Director, Field Collection
Office of Chief Counsel
Chief, Appeals
National Taxpayer Advocate
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